

EXHIBIT B

ZUBER LAWLER

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November 16, 2021

VIA FEDEX

Mr. Christopher Saunders
1056 Lake View Drive
Stafford, VA 22556

Re: Cease and Desist Broadcasting of Defamatory Statements

Dear Mr. Saunders:

My firm represents Gold Standard Banking Corporation AG (“GSB”), a company registered under the laws of The Federal Republic of Germany, as well as its agents and principals, including Messrs. Josip Heit, Michael Dalcoe and Tony De Gouveia.

Over the past year, you have broadcast a series of false misrepresentations about GSB and its agents and principals on your YouTube channel, Grit, Grind, Gold.¹ While the First Amendment affords you with broad latitude to engage in free speech, it does not provide blanket immunity. The false and misleading statements you have repeatedly broadcast on your channel demonstrate reckless disregard for the truth and constitute actionable defamation that is not protected as free speech.² That you have continued to broadcast these statements in spite of multiple take-down requests in other jurisdictions further demonstrates that you have made these statements in spite of being informed they include false and misleading information.³

I. THE DEFAMATORY STATEMENTS

In the Commonwealth of Virginia, from where you broadcast, defamation is a civil tort that occurs upon: (i) the publication of (ii) an actionable statement (iii) of or concerning the plaintiff, (iv) with the requisite intent.⁴ Where the actionable statement is a purported statement of fact, rather than mere hyperbolic rhetoric, such statements constitute actionable defamation *per se*, pursuant to the Supreme Court of Virginia.⁵ As discussed below, you have engaged in *per se* defamation as a result of the false and misleading statements of fact you have broadcast on Grit, Grind, Gold. Further, your persistence in continuing to do so, along with the fact that this

¹ Christopher Saunders (Grit, Grind, Gold), YouTube (“**Grit, Grind, Gold YouTube Channel**”), <https://www.youtube.com/channel/UCazBmw6adX2wXyJAYgZSrW/videos> (last updated November 4, 2021).

² *Schaecher v. Bouffault*, 290 Va. 83, 103, 772 S.E.2d 589, 600 (2015), referencing *Raytheon*, 273 Va. at 303, 641 S.E.2d at 84 (quoting *Milkovich*, 497 U.S. at 21, 110 S.Ct. 2695).

³ See Exhibit A, June 18, 2021, Kyiv City Pechersky District Court; See Exhibit B, June 18, 2021, Kyiv City Pechersky District Court.

⁴ *Tharpe v. Saunders*, 285 Va. 476, 480, 737 S.E.2d 890, 892 (2013) (internal quotation marks omitted).

⁵ *Yeagle v. Collegiate Times*, 255 Va. 293, 297, 497 S.E.2d 136, 138 (1998).

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persistence is motivated by personal gain,⁶ subjects you to civil liability that may include punitive penalties. Below is a summary of some of the most egregious defamatory statements you have broadcast to date. Notably, each of the videos in which you make false statements about GSB and its agents and principals constitutes a separate publication (and thus a separate act of defamation for which you are individually and cumulatively liable).

(a) YOUR REPRESENTATION THAT GSB AND KARATBARS ARE THE SAME ENTITY

A statement is actionable when it is both false and defamatory. Without any concrete factual basis to support the substance of your publications, on several occasions you have conflated GSB with Karatbars, thereby making a false, actionable publication. Specifically, you have made a series of erroneous misrepresentations equating GSB with Karatbars, such as the following:

“... [T]he number one source on the internet for exposing the crypto currency criminals and the crypto currency scam that originally started as Karatbars International but due to a lot of bad press **has changed their names a lot of times. So now its Karatbars International**, Free Bay AG, Free Bay Universe, **Gold Standard Bank**. You name it, **It's all the same scam people, It's all the same people.**”⁷

“... If you're new to the channel, I've been exposing a crypto-currency scam **that originally started as Karatbars International but all the players are the same and they've metamorphed [sp] and transformed into Gold Standard Bank.**”⁸

“Average, blue-collar people are who the Gold Standard Bank's targeting, people that don't know shit about crypto, this was the same target group and demographic people they, uh, hit in Karatbars and if you guys don't know what Karatbars is and you're in the Gold Standard Bank, then obviously they're hiding something from you, **because 90% of your leadership council and everybody that's top dogs within the Gold Standard bank came from Karatbars** and Karatbars just ran off with a whole bunch of people's money so would you trust that company, no, I don't think so.”⁹

⁶ Grit, Grind, Gold YouTube Channel, *I Smell a Dirty Foot*, at 15:16-15:19, YouTube (November 4, 2021), <https://www.youtube.com/watch?v=lghTaxJeJpE> (“I'm getting paid. My crime boss is YouTube.”).

⁷ Grit, Grind, Gold YouTube Channel, *New Zealand And the FMA Reissue Regulatory Warning Against Karatbars*, at 0:08-0:31, YouTube (June 1, 2021), <https://www.youtube.com/watch?v=hXI00A5Vq0E>.

⁸ Grit, Grind, Gold YouTube Channel, *MasterCard Taking Bitcoin Payments, Is this the End for GSLifestyle Card?*, at 0:34-0:46, YouTube (October 27, 2021), <https://www.youtube.com/watch?v=boTZ0eCII3M>.

⁹ Grit, Grind, Gold YouTube Channel, *How Much Should You Trust Josip Heit and His IPO*, at 0:49 - 1:18, YouTube (October 9, 2021), <https://www.youtube.com/watch?v=H6ZHLR-wbuk>.

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“I’ve been exposing a crypto currency scam known as Karatbars International for the past year, **Karatbars was transformed under the Gold Standard Bank.**”¹⁰

“So the Gold Standard Bank is Karatbars International, Karatbars International is the Gold Standard Bank. It’s just a crypto criminal scam trying to run off with all your money.”¹¹

“If you’re in the Gold Standard Back and you’re trusting the Gold Standard Partners right now, I’m going to tell you just like I told Karatbars affiliates before, trusting Gold Standard Partners is like trusting Gold Director Elite Threes from Karatbars **because they’re the same people...** so you’re trusting the same people that have already ripped people the fuck off.”¹²

“So, uh, if you were one of those companies and you got one of these notices, and those notices got sent out in October of 2021, what would you do? **Simple, change companies.** Take everybody from your company and change it just **Karatbars did with Gold, just like Josip Heit did with the Gold Standard Bank.** Oh, we’re getting in trouble. Let’s just make a new company and do the exact same bullshit.”¹³

First, GSB and Karatbars are wholly independent, legal entities. GSB has no legal affiliation with Karatbars; it is neither a parent nor subsidiary nor affiliate of Karatbars; and it wholly exists as a separate and independent entity. Second, GSB is a software development technology company that has successfully operated in the blockchain space and serviced multiple clients for several years. That Karatbars previously retained GSB to provide discrete services relating to GSB’s expertise in the blockchain space does not make Karatbars and GSB the same company. Third, GSB was also an investor in Karatbars. That GSB invested in Karatbars does not make them the same company. At no time did GSB ever exercise any control over Karatbars. Moreover, while Karatbars is now understood to have purportedly looted its customers, GSB was a victim of this theft, not a perpetrator. Indeed, GSB and Mr. Heit did not profit from their relationship with Karatbars; they in fact lost millions of dollars through their investment. Fourth, employees, investors, and affiliates frequently move between clients and vendors, especially in small industries such as the blockchain and cryptocurrency industry. That GSB and Karatbars may share certain employees, investors, and/or affiliates does not make them the same company. While you characterize the fact that certain affiliates moved from Karatbars to GSB as “proof” they are the same company, this assertion is entirely undermined by the fact that Karatbars’ founder and Chief Executive Officer, Mr. Harald Seiz, has continued on in his

¹⁰ Grit, Grind, Gold YouTube Channel, *Is this Proof Karatbars and GSB have been a scam since day one?*, at 0:12 – 0:20, YouTube (October 7, 2021), <https://www.youtube.com/watch?v=Em1QUflStT4>.

¹¹ Grit, Grind, Gold YouTube Channel, *PROOF that Gold Standard Bank and Karatbars International are the same company*, at 2:13 – 2:15, YouTube (September 27, 2021), <https://www.youtube.com/watch?v=yQIht-HKPkU>.

¹² Grit, Grind, Gold YouTube Channel, *Is Grit Grind Gold Just Full of Fud*, at 4:38 – 5:06, YouTube (September 14, 2021), <https://www.youtube.com/watch?v=Syo1QmLpoCU>.

¹³ Grit, Grind, Gold YouTube Channel, *The FTC, Karatbars International and GSB*, at 1:12 – 1:32, YouTube (November 3 2021), https://www.youtube.com/watch?v=_myQMqv8NUI&t=26s.

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business working with many of the same employees from Karatbars in a business that is entirely separate and apart from GSB.

Your statements equating GSB and Karatbars materially misrepresent the nature of their relationship. GSB was an investor in Karatbars that also provided services based on GSB's long-standing expertise in the blockchain industry. GSB never exercised any control over Karatbars, and was in fact a victim of Karatbars' purported fraud, not a beneficiary. Notwithstanding, you continue to make these false statements, even after you have already been informed these statements were false as a result of the take-down notices in other jurisdictions.¹⁴ Moreover, you have made these statements *knowing* that GSB and Karatbars are two entirely separate companies,¹⁵ and further *knowing* that your statements would subject you to legal consequences.¹⁶ Yet, despite your awareness of the legal consequences of your broadcasts, as well as the legal separation of the two entities you have conflated, you knowingly continued to make baseless, false allegations against GSB, including the G999, Lydian World Signature Wallet, and additional products developed by GSB and/or the Gold Standard Partner's, that you knew were potentially defamatory.¹⁷ Your knowing disregard for the truthfulness of your statements subjects you to substantial damages, including punitive damages.¹⁸

(b) YOUR REPRESENTATION THAT GSB IS ENGAGED IN A PONZI SCHEME

Additionally, in several video publications, you refer to GSB and its agents and principals as engaging in a Ponzi scheme. For instance, you've stated the following:

¹⁴ See Exhibit A, June 18, 2021, Kyiv City Pechersky District Court; See Exhibit B, June 18, 2021, Kyiv City Pechersky District Court.

¹⁵ Grit, Grind, Gold YouTube Channel, *The FTC, Karatbars International and GSB*, at 2:23 – 2:34, YouTube (November 3 2021), https://www.youtube.com/watch?v=_myQMQv8NUI&t=26s ("That's why even though Karatbars and Gold Standard Bank on paper might be two separate companies, they're still doing the same deceptive practices and they're just, they're just, they're switching clothes so they can't, they won't get caught").

¹⁶ Grit, Grind, Gold YouTube Channel, *Weekly Update, My Mom's Basement, GsPartner Facts and the The New Set of Playlist*, at 9:53-10:02, YouTube (May 27, 2021), https://www.youtube.com/watch?v=_FEoolSLOAM ("I will be the voice. I will be the one with the bullseye on my head. I will take the target. I will take the legal actions. I'll take all the heat").

¹⁷ Grit, Grind, Gold YouTube Channel, *I smell a Dirty Foot*, at 9:15 – 9:39, YouTube (November 4 2021), <https://www.youtube.com/watch?v=lghTaxJeJpE> ("[Christopher Saunders] will be dealt with, it's already in the process." I've been hearing that since I've started this shit during Karatbars so fuck off. "No worries here, multiple videos, podcasts, statements, posts have been collected and sent to the attorneys." Woohoo, guess what you never took an attempt to actually pull one down from YouTube now did you? "There's a lot more to Chris and his gang of goons." I think that's defamation, right?").

¹⁸ *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 342, 347, 94 S.Ct. 2997, 41 L.Ed.2d 789 (1974).

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“How many cans have they kicked down the road. So yesterday, the IPO was supposed to come out, lets promote the Lydian world before that it’s the XLT, you guys are chasing a pipe dream that is **nothing more than a Ponzi scheme.**”¹⁹

“It ties into everything that has revolved around Karatbars, the Gold Standard Bank, the Gold Standard Partners, Josip Heit, Harold Seiz, Mike Dalcoe, Tammy Morrison, like all these crypto, you know like we call them **crypto criminals, Ponzi prostitutes, network marketing whores.**”²⁰

“G999 hired network marketing whores, **Ponzi prostitutes**, came up with a slutty white paper in order to sell the most they in the shortest period of time so that they could make money.”²¹

“I’ve been using a term as of lately called **Ponzi prostitutes**. I’ve been calling pretty much all of the Gold Standard Partners that.”²²

“I’ve been bringing a lot of heat on the **South African Ponzi Prostitute** crew of Gold Standard Bank, which resolves around Tony De Gouveia.”²³

“If you’re anybody that is associated with this crew of South African whores, **Ponzi prostitutes** if you will, you want to watch this video because I’m going to explain to you **how you’re breaking South African law.**”²⁴

“They know they don’t want to step into court because they’re a bunch of **Ponzi pussies**, uh, is what it boils down to.”²⁵

“Josip Heit, the CEO, from or the CEO within Gold Standard Bank is also, was also, a chairman of the board of the Karat Bank and they all came from Karatbars. When you compare the KBC, the KCB, the G999, all these gold backed cryptocurrencies that all of these cryptocurrency like what the CryptTalk Nation has been calling **Ponzi prostitutes.**”²⁶

¹⁹ Grit, Grind, Gold YouTube Channel, *Uh Oh No GSP IPO*, at 2:04 – 2:20, YouTube (October 16, 2021), <https://www.youtube.com/watch?v=ITBeD-ppCoY&t=2s>.

²⁰ Grit, Grind, Gold YouTube Channel, *WEEKLY UPDATE, SEC Reply, Mike Dalcoe’s Deleted Comment and Jen McAdams*, at 4:59 – 5:18, YouTube (September 2, 2021), <https://www.youtube.com/watch?v=G6BXf7loU64>.

²¹ Grit, Grind, Gold YouTube Channel, *G999 vs BTC*, at 4:19 – 4:33, YouTube (August 30, 2021), <https://www.youtube.com/watch?v=IJRYih2G1v4>.

²² Grit, Grind, Gold YouTube Channel, *GSPartner Tony De Gouveia and The South African Sidekick’s Blueprint of how to rob you blind*, at 0:08- 0:014, YouTube (July 12, 2021), https://www.youtube.com/watch?v=poPPS_IkO3k.

²³ Grit, Grind, Gold YouTube Channel, *Are GSPartners Breaking the Law*, at 0:09 – 0:15, YouTube (October 27, 2021), <https://www.youtube.com/watch?v=wK1Gogd0Wjs>.

²⁴ *Id.* at 0:32 - 0:46.

²⁵ *Id.* at 2:13 – 2:17.

²⁶ Grit, Grind, Gold YouTube Channel, *G999 vs BTC*, at 1:21 – 1:46, YouTube (August 30, 2021), <https://www.youtube.com/watch?v=IJRYih2G1v4>.

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A Ponzi scheme is defined as a fraudulent investment operation that lures investors and pays profits to earlier investors with funds from more recent investors.²⁷ Colloquially, the term is affiliated with some of the worst crimes in America history, which includes Bernie Madoff, who was convicted of stealing more than twenty billion dollars from unsuspecting investors, such that mere utterance of the expression is thought to engender impassioned feelings of vitriol and exploitation.²⁸ Courts have repeatedly recognized the negative implications of correlating the Ponzi scheme descriptor to an individual or an enterprise as a defamatory statement.²⁹ Specifically, the Court in *Vizant Technologies, LLC v. Whitchurch*, found that YouTube statements correlating a Plaintiff with a Ponzi scheme were defamatory.³⁰

GSB and its agents and principals have never been charged with or convicted of any crime alleging a Ponzi scheme. This is because GSB is not engaged in a Ponzi scheme. Rather, it is a legitimate enterprise at the forefront of the nascent, cryptocurrency space. In response to your allegations, GSB retained an independent law firm to conduct a comprehensive internal investigation targeting these charges. This investigation examined the internal mechanics of the organization to determine if there was any evidence of, among other things, money laundering, transaction laundering, BRAM/GBPP violations, licensing and SEC issues, and improper contractual and sales practices. The investigation concluded there was no wrong-doing, and will be used to demonstrate the falsity of your defamatory statements.

(c) YOUR REPRESENTATION THAT GSB AND JOSIP HEIT ARE ENGAGED IN CRIMINAL ACTIVITIES OF MORAL TURPITUDE

Further, you have made and continue to make repeated allegations concerning the criminality of GSB and Mr. Josip Heit's actions, including:

“Then we’re gonna get into a treasure chest of legal documents that was sent to be by, I can’t say who, that deals with what looks like at a glance right now, **roughly \$320 million dollars of money laundering that happened between Harold Seiz and Josip Heit.**”³¹

“So lets talk about the, uh, **money laundering**, so I got, I received, a plethora of documents, um, actual, official documents and these actually connect to Anna Krimsten, Krimsten, the lawyer as well, uh, like, backdated, like you, it’s taken a while to go

²⁷ *Ponzi Scheme*, DICTIONARY.COM, <https://www.dictionary.com/browse/ponzi--scheme> (last visited November 16, 2021).

²⁸ CNN, *8 of the most notorious Ponzi schemes in US history*, <https://www.cnn.com/2021/04/24/business/famous-ponzi-schemes-generation-hustle/index.html>.

²⁹ *Vizant Techs., LLC v. Whitchurch*, No. CV 15-431, 2016 WL 97923, at *1 (E.D. Pa. Jan. 8, 2016), aff’d, 675 F. App’x 201 (3d Cir. 2017), as amended (Feb. 2, 2017).

³⁰ *Id.*

³¹ Grit, Grind, Gold YouTube Channel, *Weekly Update, Alex Bodi back in jail, RealT Tokenized Real Estate and Money Laundering*, at 0:42 – 1:04, YouTube (October 15, 2021), <https://www.youtube.com/watch?v=wK1Gogd0Wjs>.

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through these documents, simply bc they have to be translated from multiple different languages, German, Russian, stuff like that, uh, CryptTalk Nation has been going through them, from the glance, these documents were handed over to me, and the you know, the message **was proof of 320 million dollars of wire fraud, or not wire fraud, money laundering**. And somebody from the main office of Karatbars in Stuttgart, had gotten a hold of me **and kept saying that Josip Heit was brought into Karatbars to launder Harold Seiz's money** and gave a couple of examples but they didn't have any proof but now these documents all of sudden popped up, and a, it's you know, I just did a video not too long ago **breaking down the numbers of how much money these crooks, these crypto criminals were generating, and then when I get this, it's like 320 million dollars of money laundering**, its, its, my numbers aren't a hundred percent accurate but it's definitely looking like that and it's definitely, its definite proof. So as much as the Gold Standard Bank and the Gold Standard Partners want to wash their hands of KaratBars, um, Josip Heit was their laundry boy, Josip Heit was the laundry boy for KaratBars international.”³²

“I mean your coin is doing good, but it looks like a fuckin pulse the way it's up and down cuz it's a Pon you know, **it's a planned pump and dump** with Walsh Trading.”³³

“I'm trying to help you people **not get ripped off** in crypto scams like the Gold Standard Bank.”³⁴

“I think that what Josip's probably gonna try to do is try to quickly put together a couple of shell companies to make it look like he's gonna get an IPO and this is just another money-grab no different than the uh, XLT tokens. It's gonna be something that's like, hey, pay for this now, and then you can get some money for it later down the road after we disappear and dissolve just like Karatbars did. **So would I trust the actual IPO that the gold standard bank and Josip Heit and the gold standard partners are offering, absolutely not.**”³⁵

“Even though Harold Seiz had his name on Karatbars, Josip Heit hired Anna Krishtene, Krishtime, and formed this trust and **basically laundered a whole bunch of Karatbars money into it**. This is a way that Harold, not Harold, I'm sorry **Josip could have taken money from Harold to control the Karatbars money and rob you from the Karatbars money and make it look like Harold did it**. Make sense? Josip starts the

³² *Id.* at 4:46 – 6:35.

³³ *Id.* at 12:05 – 12:14.

³⁴ Grit, Grind, Gold YouTube Channel, *How Much Should You Trust Josip Heit and His IPO*, at 0:41 – 0:46, YouTube (October 9, 2021), <https://www.youtube.com/watch?v=H6ZHLR-wbuk>.

³⁵ *Id.* at 1:56 – 2:29.

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trust with a dirty lawyer, takes all of Harold's money, Harold name is on everything but **Josip's the one that robbed you, and then makes it look like karat's done it.**³⁶

"The one thing we have definitely found a consistent pattern in this small group of very specific group of people is that you **like to doctor documents, invoices, banking licenses**, so it would not be a shock if the documents were forged within this trust making this trust illegal."³⁷

"They pocketed your money. Harold Seiz created a company to pocket your money, **hired Josip Heit to launder the money, then Josip Heit being the crook that he is stole the laundered money and started a new company to do the same thing** that Harold Seiz just did."³⁸

"Because the Gold Standard Partners are secretly committing security fraud."³⁹

"The Gold Standard Bank and the Gold Standard Partners are committing securities fraud."⁴⁰

"So basically they have a year for this fund raiser that's why they want to privately run this brochure so nobody sees what's going on, **because they're committing securities fraud. You're basically giving Josip Heit and the top leaders the money to buy the condos in this apartment in Dubai where the law won't touch them.**"⁴¹

"I know a lot of people have said that you know there was a fallout between Josip Heit and Harold Seiz. I think this was a manufactured and intentional propaganda fallout because all it did **it allowed Karatbars to channel their money into gold standard bank**. I don't think it was a fallout. I think it was a very well designed exit strategy so that they **could rob all of you guys blind.**"⁴²

"Gold Standard Bank learned from that that's why you have the Kazakstan license, the Cosmos bank license, well, it's not even licensed, you have all this fake shit that's spread over. What it does is if anybody truly wants to investigate this from a legal standpoint, it's a fuckin maze and the reason they do that is for exactly what Karatbars just

³⁶ Grit, Grind, Gold YouTube Channel, *Did Harold Seiz Rob you or did Josip Heit rob Harold Seiz*, at 3:09– 3:50, YouTube (October 9, 2021), <https://www.youtube.com/watch?v=g9B1UJKCE6A>.

³⁷ *Id.* at 4:36 – 5:00.

³⁸ Grit, Grind, Gold YouTube Channel, *Is this Proof Karatbars and GSB have been a scam since day one?*, at 12:40 – 12:58, YouTube (October 7, 2021), <https://www.youtube.com/watch?v=Em1QUfIStT4>.

³⁹ Grit, Grind, Gold YouTube Channel, *LIVE UPDATE, Security Fraud, A Shitty XLT Brochure and Josip Heit's Bullshit Lies*, at 0:24 – 0:29, YouTube (October 4, 2021), <https://www.youtube.com/watch?v=z6F6pgje38U>.

⁴⁰ *Id.* at 1:16 – 1:20.

⁴¹ *Id.* at 6:33 – 6:52.

⁴² Grit, Grind, Gold YouTube Channel, *Breaking News Will Brendon Earp-Jones Be the Fall of the Karatbars Crypto Cyndicate?*, at 3:52 – 4:16, YouTube (September 17, 2021), https://www.youtube.com/watch?v=7uAjFNAyg_8.

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accomplished, by the time you figure out that there is no company, there is nobody to sue, and they ran off with your money.”⁴³

“They’re trying to sell as much product as possible in the shortest period of time because it’s a get rich quick scheme, **it’s a pyramid scam.**”⁴⁴

“It’s an MLM, it’s a pyramid scheme, and that’s exactly what the Gold Standard Bank is.”⁴⁵

“It’s because they’re scamming you. I mean it’s plain and simple, **its deception, its manipulation, its fraud.** That’s exactly what it is, I mean, there’s no way around it.”⁴⁶

“You are literally paying for the criminals taking your money to hide away in a land where you can’t touch them.”⁴⁷

“It’s a money grab. **Josip Heit is going to take your money** and buy his apartment so he doesn’t have to travel all around the world and can be completely protected in Dubai.”⁴⁸

“Ask your sponsor because **it is a MLM, it is a pyramid scheme**, it is a network marketing structure.”⁴⁹

You continuously engage in publications ascribing criminality to GSB while publicly acknowledging a lack of enforcement investigations related to the very accusations you continuously repeat.⁵⁰ In several video publications, you refer to GSB and Josip Heit as criminals engaged in activities of moral turpitude. Under Virginia law, statements that “impute to a person the commission of some criminal offense involving moral turpitude, for which the

⁴³ Grit, Grind, Gold YouTube Channel, *Live Update Where is the Karatbars Gold and the true intent of GSPartners*, at 6:53 – 7:25, YouTube (September 11, 2021), <https://www.youtube.com/watch?v=muXQAfzlOAs>.

⁴⁴ Grit, Grind, Gold YouTube Channel, *G999 vs BTC*, at 5:57 – 6:04, YouTube (August 30, 2021), <https://www.youtube.com/watch?v=lJRYih2G1v4>.

⁴⁵ Grit, Grind, Gold YouTube Channel, *Weekly Update Mastercard, the FCA reply and future billionaires*, at 5:14 – 5:19, YouTube (August, 2021), <https://www.youtube.com/watch?v=ZJC9aqLoIHE&t=316s>.

⁴⁶ Grit, Grind, Gold YouTube Channel, *WEEKLY UPDATE, the Banking License, A Good Book, and Tokenizing Real Estate - Youtube*, at 4:11 – 4:25, YouTube (July, 2021), https://www.youtube.com/watch?v=96Gi_XesEcA

⁴⁷ Grit, Grind, Gold YouTube Channel, *Phase 1 of GSB and the G999 Living Deal*, at 2:35 – 2:45, YouTube (July 21, 2021), <https://www.youtube.com/watch?v=0hRJ5yU4Bxo>.

⁴⁸ *Id.* at 3:06 – 3:17.

⁴⁹ Grit, Grind, Gold YouTube Channel, *4 Facts the GSPartners Do not want to Admit*, at 5:57 – 6:07, YouTube (July 15, 2021), <https://www.youtube.com/watch?v=IqBKIXTc0oU>.

⁵⁰ Grit, Grind, Gold YouTube Channel, *Weekly Update, Alex Bodi back in jail, RealT Tokenized Real Estate and Money Laundering*, at 8:07 – 8:11, YouTube (October 15, 2021), <https://www.youtube.com/watch?v=rZ3O2QNeItQ> (“I’m still waiting on you know legal ramifications from the uh, team cocksuckers, that’s what we call them because they’re not rockstars.”; *Id.* at 9:13 – 9:15 (“I think when it comes, as far as like, the government authorities like for the US, the FBI, the SEC, I think they’re really dropping the ball on this. CryptTalk Nation has done pretty much their job for them.”)).

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party, if the charge is true, may be indicted or punished,”⁵¹ are the kinds of statements that are actionable as defamation *per se*. Furthermore, the inherent criminality, and its resulting hazardous impact upon the economic vitality of Gold Standard Bank and Josip Heit, are of the caliber that do not require the pleading of special damages, as they “contain an imputation that is “necessarily hurtful” in its effect upon [Gold Standard Bank’s/Josip Heit’s] business,” such that it necessarily “affects [Gold Standard Bank/Josip Heit] in [their] particular trade or occupation.”⁵² Furthermore, the statements are actionable as defamation *per se* because they “prejudice [Gold Standard Bank/Josip Heit] in his or her professional trade.”⁵³

II. DEMAND FOR RELIEF

Your persistence in making unfounded and false allegations against GSB and its agents and principals constitutes *per se* defamation. The fact you continue to do so with knowledge that these statements are false and with the intent to personally profit from these statements at the expense of causing economic harm to GSB and its agents and principals, subjects you to substantial damages, including punitive damages.

As a result of your actions, our clients intend to take legal action, unless you provide written assurance within ten (10) days receipt of this letter, that you will (i) cease and desist from further publications using Grit, Grind, Gold, or any other platform, and (ii) remove from circulation any video or other public statement or broadcast on Grit, Grind, Gold, or otherwise under your control, that references GSB and its agents or principals, in a manner that is factually untrue, including but not limited to statements:

1. Conflating Karatbars and GSB as being the same organization;
2. Accusing GSB or its agents and principals of engaging in Ponzi scheme; and
3. Accusing GSB or its agents and principals of engaging in criminal conduct.

If the foregoing written assurances are not timely provided, a complaint against you will be filed in a Virginia court seeking an injunction, damages (including punitive damages), and other appropriate relief.

Please note that this letter is provided to you without prejudice and does not purport to address all facts and issues concerning your offensive conduct and statements. GSB expressly reserves all rights, remedies, claims and defenses available to them under applicable law.

⁵¹ *Tronfeld v. Nationwide Mut. Ins. Co.*, 272 Va. 709, 713, 636 S.E.2d 447, 450 (2006).

⁵² *Fleming v. Moore*, 221 Va. 884, 889–90, 275 S.E.2d 632, 636 (1981) (citing *James v. Haymes*, 160 Va. 253, 261-62, 168 S.E. 333, 336 (1933)).

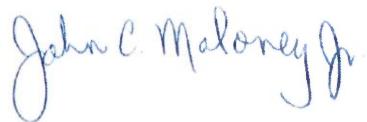
⁵³ *Tronfeld v. Nationwide Mut. Ins. Co.*, 272 Va. 709, 713, 636 S.E.2d 447, 450 (2006).

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Christopher Saunders
November 16, 2021
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Regards,

ZUBER LAWLER LLP



John C. Maloney, Jr.
Partner